

1. I am 53 years old and reside in PII. I am familiar with Dayemi Organization, which operates multiple for-profit businesses, including Longbranch Café and Bakery, and a non-profit entity. I am also familiar with Dayemi Tariqat, a spiritual group related to Dayemi Organization. I was involved both with Dayemi Tariqat, as a devotee, and the Dayemi Organization, as an employee, from 1997 until March 2020.
2. I worked for the Dayemi Organization's businesses from approximately 1999 until 2020. Specifically, I worked at Longbranch Café, located at 100 E. Jackson Street in Carbondale, Illinois, beginning in approximately 1999. I worked at Longbranch Café on and off until approximately 2016. During the period of approximately 1999 through approximately 2016, I also worked at a Middle Eastern restaurant and a company called Town Square Market, both of which were operated by Dayemi Organization. From approximately 2016 to March 2020, I worked at Longbranch Bakery, located at 218 N. Illinois Street, in Carbondale, Illinois. During my employment with Longbranch Café and

Bakery, I sometimes worked a part-time schedule and other times worked as a full-time schedule.

3. I was a devotee of Dayemi Tariqat, (the “Community”) from 1997 to March 2020. The Community and Dayemi Organization are led by Dean al-Dayemi (“al-Dayemi”), who calls himself the “Murshid,” meaning “Guide” in Arabic. Al-Dayemi is involved in every aspect of the Community and Dayemi Organization’s businesses.
4. Although the Community ostensibly has a spiritual component, in my opinion, the Community is actually used to coerce and manipulate devotees into serving the desires of al-Dayemi.
5. When I first joined the Community, it had about 70 to 80 members in Carbondale and a satellite group of devotees in Denver, Colorado, and Germany. I believe that the Community has now shrunk to about 40 members in Carbondale.
6. The foundational tenet of the Community is obedience to al-Dayemi’s will. Al-Dayemi presented himself as having all the answers. He claimed the Community could provide everything to meet devotees’ physical, mental, emotional, and spiritual needs. The Community teaches that the “Path” provides a complete way to understand the world and a connection to a long history of enlightenment. Me and other devotees were made to feel like we were part of something really special.
7. When I joined the Community, I took a vow of obedience to al-Dayemi. This was done in a formal ceremony at Dayemi Tariqat’s community house on Oak Street in Carbondale. During this ceremony, I sat on my knees in front of al-Dayemi and vowed to obey him. I was given a ring as a symbol of my spiritual marriage to al-Dayemi.
8. Al-Dayemi gave me and his other devotees new names and told us we were being

“reborn.” I was called Tariq Muhammad Ikhlas. Al-Dayemi presented it as a blessing and made me and the other devotees feel special.

9. I was told that my job was to digest al-Dayemi’s feedback. I took this very seriously and would have done anything al-Dayemi asked of me.
10. In my experience, al-Dayemi wanted devotees to give him everything they had and created a feeling of indebtedness in devotees, which kept us giving our time, labor, and money.
11. There was immense internal pressure to do what al-Dayemi wanted with little freedom to express our own desires or exercise agency. Other devotees and I intentionally sought to see things as al-Dayemi saw them and do things as he did them. If he said the sky was green, I would have believed the sky was green.
12. Me and the other devotees were taught to shut out or deny any information that was contrary to al-Dayemi or did not come from him. Al-Dayemi and his wives would make it seem like any negative information about al-Dayemi was to be discounted, saying “prophets always get persecuted.” Even if I was faced with a legal threat or penalty of perjury, I would have done what al-Dayemi told me to do.
13. Al-Dayemi is officially married to Elaine Ramseyer.
14. Being in the Community meant every aspect of my life was impacted. I lived on property owned by the Community and worked at the Bakery and other businesses run by al-Dayemi. Half of my paycheck went back to the Community through tithing and rent.
15. Ramseyer is the General Manager of Longbranch Café, but al-Dayemi is involved in running the business behind the scenes. Al-Dayemi was always checking in on the businesses. I witnessed him showing up at Dayemi Organization owed businesses and

giving orders and instructions about even minute aspects of the businesses. We knew we had to carry out his instructions and orders immediately. At any moment, al-Dayemi could have walked in and changed things to suit his desires. Ramseyer will always do exactly as she's told by him regarding any aspect of the business.

16. Ramseyer is the public face for Longbranch Café and Bakery. She is very charismatic and intimidating. She could get me to do whatever she wanted because I knew anything I said to her would get back to al-Dayemi.

17. I was not the only devotee of the Community working at Longbranch Café and Bakery. There was also a business consultant and some younger staff members who were part of the Community. However, not all staff members were part of the Community and, at any given time, there were probably more staff members who were not in the Community than staff members who were in it.

18. Based on my personal experience and knowledge from 20+ years in the Community and my time working for businesses owned by Dayemi Organization, including Longbranch Café and Bakery, the following individuals are involved with the Community as described below:

- a. Jamie Babre – I've known Ms. Barbe since approximately 2017 or earlier. I knew her socially as part of the Community, and I believe we worked together at Longbranch. Ms. Babre is deeply involved in the Community, and is close with al-Dayemi and Ramseyer;
- b. Madison Pellow – I've known Ms. Pellow since 2000 or 2001, as her parents became involved in the Community since she was a kid. I lived next door to the Pellow family when Ms. Pellow was younger and we shared meals together. Ms.

Exhibit 14

Pellow is part of the Community as her parents are inner circle devotees. Her parents co-own Town Square Market with Dayemi Organization.

19. Since leaving the Community in March 2020, I've spoken out about my experience in the Community, despite fearing retaliation from the Dayemi Organization and the Community. Al-Dayemi is very powerful and has powerful people around him. Based on my experience in the Community, I am aware that al-Dayemi has tracked people and had people stalked on social media. I have spoken to other ex-devotees of the Community who are scared to speak out because they believe there is a threat of retaliation from the Community.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March ___, 2022

Signed: Todd Brown
TODD BROWN